



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 11 2012

REPLY TO THE ATTENTION OF:

WC-15J

CERTIFIED MAIL 7009 1680 0000 7635 8576
RETURN RECEIPT REQUESTED

FOIA Exemption (b) (6)

FOIA Exemption (b) (6) Pork Farm

3640 Honeysuckle Road
Coulterville, Illinois 62237

Dear **FOIA Exemption (b) (6)**:

On November 9, 2011, U.S. Environmental Protection Agency conducted an inspection of your facility, **FOIA Exemption (b) (6)** Pork Farm in Coulterville, Illinois. The purpose of the inspection was to determine whether your facility is in compliance with the Clean Water Act (CWA) and its implementing regulations under 40 Code of Federal Regulations (C.F.R.) Part 122 applicable to Large Concentrated Animal Feeding Operations (CAFOs). The report generated from that inspection is attached.

The CWA provides that no point source may discharge pollutants to waters of the United States without a permit. Section 301(a) of the CWA, 33 U.S.C. § 1311(a). The regulations under 40 C.F.R. Part 122 govern the National Pollutant Discharge Elimination System (NPDES) under the CWA and the duty to apply for NPDES permits for point sources that discharge pollutants to waters of the United States. 40 C.F.R. Part 122 provides that "Large CAFOs" are "point sources" under the CWA, including those CAFOs that stable or confine more than 2,500 swine each weighing 55 pounds or more or 10,000 swine each weighing less than 55 pounds. See 40 C.F.R. §§ 122.21(a) and 122.23. Your facility constitutes a "Large CAFO" under 40 C.F.R. Part 122. If a Large CAFO discharges pollutants (e.g., manure, litter, or process wastewater) into the waters of the United States, it must apply for a NPDES permit under 40 C.F.R. Part 122, and is subject to the applicable Effluent Limitations Guidelines and Standards for CAFOs under 40 C.F.R. Part 412.

As noted in the inspection report, the following are potential violations which require attention:

EPA observed during the inspection that the hose used to pump manure from the solids settling basin has leaked manure onto the ground. Sampling conducted during the inspection indicates that pollutants have been discharged into the unnamed tributary that runs through the facility. The unnamed tributary is a water of the United States, and thus any discharge of pollutants into the tributary without a permit violates Section 301(a) of the CWA.

The exterior manure pit south of the Wisconsin Building was full and was in need of emptying. Such condition can lead to overflow during precipitation events that could result in a discharge of pollutants to waters of the United States without a permit in violation of Section 301(a) of the CWA.

There were no depth markers located in the manure storage ponds. Under 40 C.F.R. Part 412, Large CAFOs that discharge into waters of the United States must have installed for all open surface liquid impoundments a depth marker that clearly indicates the minimum capacity necessary to contain the runoff and direct precipitation of a 25-year, 24-hour rainfall event.

EPA found during the inspection that your facility does not have a Nutrient Management Plan. The lack of a Nutrient Management Plan or equivalent records showing compliance with the requirements of the agricultural storm water discharge exemption makes any run-off from land application fields subject to NPDES violations. With respect to land applications, the discharge of manure, litter, or process wastewater to waters of the United States from a CAFO as the result of the application of that manure, litter, or process wastewater by the CAFO to land areas under its control is a discharge from that CAFO subject to NPDES permit requirements, except where it qualifies as an "agricultural storm water discharge." See 40 C.F.R. § 122.23(e). For unpermitted Large CAFOs, a precipitation-related discharge of manure, litter, or process wastewater from land areas under the control of a CAFO shall be considered an agricultural stormwater discharge only where the manure, litter, or process wastewater has been land applied in accordance with site-specific nutrient management practices that ensure appropriate agricultural utilization of the nutrients in the manure, litter, or process wastewater. Such nutrient management practices are specified under 40 C.F.R. § 122.42(e), including, among other things, implementation of a Nutrient Management Plan.

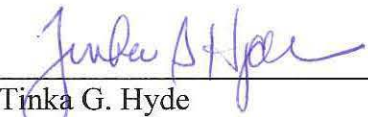
Please provide an explanation of how you plan to or already have remedied the above items within 45 days from the date of receipt of this letter. Please submit a detailed explanation to:

Water Enforcement & Compliance Assurance Branch (WC-15J)
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
Attention: Ben Atkinson, Agronomist

Failure to remedy these potential violations may subject FOIA Exemption (b) (6) Pork Farm to enforcement action pursuant to Section 309 of the CWA.

If you have any questions, please contact Ben Atkinson at (312) 353-8243 as soon as possible.

Sincerely,



Tinka G. Hyde
Director, Water Division

cc: Bruce Yurdin, IEPA
Bruce Rhodely, IEPA
Brian Rhodely, IEPA

**CWA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5**

Purpose: Compliance Evaluation Sampling Inspection

Facility: FOIA Exemption (b) (6) Pork Farm
3640 Honeysuckle Road
Coulterville, Illinois 62237

NPDES Permit Number: None

Date of Inspection: November 9, 2011

EPA Representatives: Felicia Chase, Environmental Scientist 312-886-0240
Ben Atkinson, Agronomist 312-353-8246

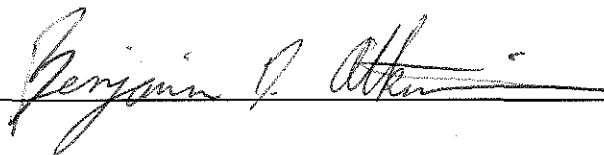
State Representatives: Bruce Rhodely, Agricultural Engineer 618-993-7200
Brian Rhodely, Env. Protection Engineer 618-993-7200

Facility Representatives: FOIA Exemption (b) (6), Owner FOIA Exemption (b) (6)

Report Prepared by: Ben Atkinson, Agronomist 618-559-0559
atkinson.ben@epa.gov

Report Date: April 9, 2011

Inspector Signature



BACKGROUND

The purpose of this report is to describe, evaluate, and document the [FOIA Exemption (b) (6)] Pork Farm's compliance with the Clean Water Act (CWA) at its Coulterville, Illinois facility on November 9, 2011.

[FOIA Exemption (b) (6)] Pork Farm is a sole proprietorship swine operation in Washington County, Illinois. On November 9, 2011, the facility had approximately 2,200 swine weighing less than 55 pounds and 4,560 swine weighing greater than 55 pounds. The capacity of the facility is 7,500 swine. All the animals are confined in barns. [FOIA Exemption (b) (6)] stated that in 1983 the facility had its lowest number of swine, 400, that were ever confined at the facility. The [FOIA Exemption (b) (6)] Pork Farm reached its maximum number of swine confined at the facility in the summer of 2011, reaching 7,500. The facility is considered a Large Concentrated Animal Feeding Operation (CAFO) based on the Federal Regulations that categorize swine operation on the number of hogs maintained. The threshold to be considered a large CAFO is 2,500 swine weighing more than 55 pounds. There is currently no National Pollutant Discharge Elimination System (NPDES) permit allowing discharges from the site and the facility has never applied for one.

The [FOIA Exemption (b) (6)] Pork Farm facility is comprised of nine livestock barns. Seven of the barns were in use at the time of the inspection. One livestock barn was not in use at the time of the inspection, and one is no longer usable due to damage from a storm. Additionally, there is a two-stage manure storage pond system as well as various storage and machine barns. An intermittent unnamed tributary runs immediately between the buildings and the facility's two-stage manure storage ponds. Storm water flows to this intermittent unnamed tributary. The intermittent unnamed tributary is 3.2 miles long and it flows to the South Fork of Mud Creek. 1.7 miles downstream, the South Fork of Mud Creek flows into Mud Creek. 22.8 miles further downstream, Mud Creek flows into the Kaskaskia River. The Kaskaskia River is a navigable waterway and flows into the Mississippi River approximately 34.4 miles downstream. The South Fork of Mud Creek has been assessed for water quality, but is not on the impaired list. Mud Creek has been assessed for water quality and has been found to be impaired for dissolved oxygen, manganese, total phosphorus, and sedimentation/siltation.

SITE INSPECTION

The United States Environmental Protection Agency (EPA) along with the Illinois Environmental Protection Agency (IEPA) arrived at the [FOIA Exemption (b) (6)] Pork Farm at approximately 9:20 A.M. The temperature was approximately 47°F. EPA donned disposable boots then met with and presented credentials to [FOIA Exemption (b) (6)] at the residence located at the northern end of the [FOIA Exemption (b) (6)] Pork Farm. [FOIA Exemption (b) (6)] stated that his son, [FOIA Exemption (b) (6)], ran the farm and returned into his home to call him. [FOIA Exemption (b) (6)] arrived at approximately 9:40 A.M. Upon [FOIA Exemption (b) (6)] arrival, EPA again presented credentials and explained the purpose of the inspection.

EPA performed a records review in the machine shed of the [FOIA Exemption (b) (6)] Pork Farm. The [FOIA Exemption (b) (6)] Pork Farm had neither a Nutrient Management Plan (NMP) nor any land application records. [FOIA Exemption (b) (6)] is a Certified Livestock Manager. His Certified Livestock Manager Certificate is

current and is set to expire on March 8, 2013. FOIA Exemption (b) (6) does conduct routine visual inspections, but no records are kept. Mortalities are managed using mortality bins provided by a rendering service, Darling International Inc. All mortalities are documented and recorded. Water for the operation is provided by a pond that was created by the FOIA Exemption (b) (6) Pork Farm. Water is supplied to the swine by means of nipple waterers and any spilled water is processed with the manure. Feed is contained in bulk grain bins.

FOIA Exemption (b) (6) stated that the farm was aware of the problems associated with land application, specifically the possibility for over accumulation of phosphorus. He had soil tests completed for their land application fields. The dates of the soil tests range from March 1, 2004 – October 25, 2011. FOIA Exemption (b) (6) also stated that they had recently purchased semi-tankers fitted with flow gages so as to be able to haul their manure further and track application volumes. The farm has a two-stage manure storage pond that was constructed in 1989. The smaller eastern portion of the manure storage pond (Stage 1) has a designed .75 million gallon capacity. The larger western portion (Stage 2) has a designed 4 million gallon capacity. It was designed by the Randolph County Soil and Water Conservation Service and built by the FOIA Exemption (b) (6). They have not tested their manure to analyze the nutrient content.

The FOIA Exemption (b) (6) Pork Farm has nine livestock buildings that have been used within the past year. Table 1 summarizes the animal capacity and manure handling practices associated with each building. Attachment 1 gives an aerial overview of the farm with the barns labeled for reference.

Table 1

Building Name		Number of Animals at time of inspection	Manure Handling
Wisconsin		0	Under-building to exterior open pit
Georgia		500	Deep below building pit
Kentucky (Building Damaged in 2011)		0	N/A
Tennessee		350	Deep below building pit
Midwest	Illinois	550	Shallow below building pit to solids settling basin to manure storage ponds
	Missouri	1300	
	Kansas	550	
	Colorado	720	
Texas		2400	Deep below building pit

Walkthrough of the Facility

EPA began the walkthrough of the farm heading south from the machine shed. The first barn encountered is named "Wisconsin". Wisconsin is a nursery building with a capacity of 380 swine. It was empty on the date of the inspection. This building has a slotted floor that allows manure to run beneath and to an exterior manure pit. The exterior manure pit was full and had plant growth on the surface, but no signs of discharge were seen on the day of the inspection (Photos 1 & 2).



Photo 1. Facing northwest. Note exterior manure pit with vegetation covering most of top and the building named "Wisconsin" in the upper right corner.

Date/Time:
November 09, 2011
10:22 AM



Photo 2. Facing northwest. Note exterior manure pit with vegetation covering most of top and the building named "Wisconsin" in the upper right corner.

Date/Time:
November 09, 2011
10:22 AM

The next building encountered, "Georgia" has a 500 animal capacity and an 8ft x 12ft x 120ft manure pit below the building. West, across the driveway, sat the foundation and remains of "Kentucky" which had the roof blown off in a storm. Kentucky was used as recently as the summer of 2011; however, **FOIA Exemption (b) (6)** stated that they planned to find an alternative use for the concrete pads and would no longer be using the area for storing animals (Photos 3 and 4).



Photo 3. Facing West. The remains of Kentucky; no longer used as a livestock facility.

Date/Time:
November 09, 2011
10:26 AM



Photo 4. Standing south of "Tennessee", facing northeast. The remains of Kentucky; no longer used as a livestock facility. Tennessee is visible to the right.

Date/Time
November 9, 2011
10:29 AM

EPA continued south to “Tennessee”. This building has 8ft x 12ft x 100ft pit and a 350 animal capacity. The mortality bins, provided by Darling International, are located behind this building (Photo 5). Once filled, the bins are moved to a pickup location and Darling International is contacted.



Photo 5.
Facing south.
Note mortality
bins behind
Tennessee.

Date/Time:
November 09,
2011 10:28
AM

Turning West, EPA walked around the conjoined “Illinois”, “Missouri”, “Kansas”, and “Colorado” barns. They are collectively known as “Midwest” barns. These building have capacities of 550, 1100, 550, and 960 animals respectively.



Photo 6. Facing
west along the
Midwest
buildings.

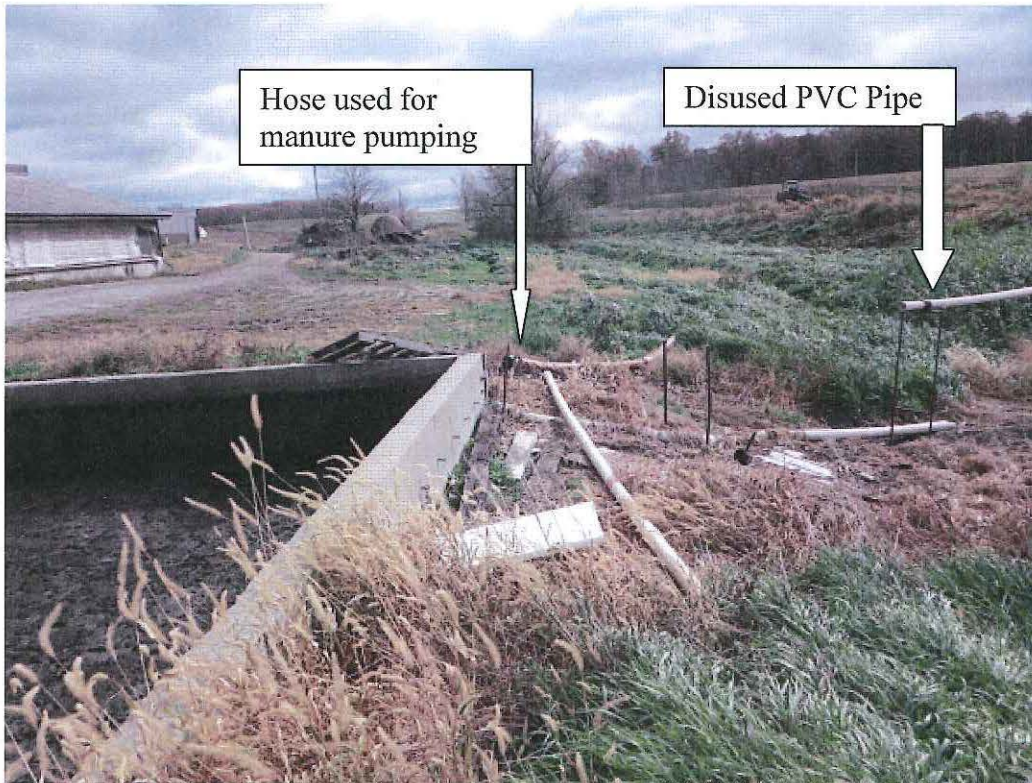
Date/Time:
November 09,
2011 10:30 AM

There is a two foot deep gravity flow pit beneath these buildings that flow to an exterior solids settling basin. This settling basin is located on the north side of the unnamed intermittent tributary that runs through the facility. The effluent from the solids settling basin is pumped to the Stage 1 manure storage pond. FOIA Exemption (b) (6) stated that the settling basin was originally designed to use a submersible pump with an automatic on/off float and be pumped through PVC pipes running above the surface; however, after several pumps failed, this system was abandoned. An external pump and hose are now employed. The hose to which the pump is attached is removed and laid on the ground when the pump is needed elsewhere. A portion of the manure remaining in the hose after pumping had discharged onto the ground around the hose and a pathway of dead vegetation was evident from where the hose was laid on the ground, to the unnamed intermittent tributary (Photos 7-12), which EPA inspectors observed at the time of the inspection.



Photo 7. Facing south behind the Midwest buildings. Manure solids settling basin. Manure storage ponds behind the basin.

Date/Time:
November 09, 2011
10:32 AM



Hose used for
manure pumping

Disused PVC Pipe

Photo 8. Facing east. Manure settling basin. PVC piping that is no longer used along with the hose that is currently used to pump liquid to ponds.

Date/Time:
November 09, 2011
10:32 AM



Photo 9. Facing east on south side of manure settling basin.

Date/Time:
November 09, 2011
10:39 AM



Photo 10. Facing west. Solids settling basin and hose used to pump liquid manure to ponds. Note vegetation burn out.

Date/Time:
November 09, 2011
10:34 AM



Photo 11. Facing south. Hose used to transfer manure to pond and apparent discharge and pathway on ground.

Date/Time:
November 09, 2011
11:57 AM



Photo 12. Facing north from south side of unnamed intermittent tributary. Note apparent discharge pathway to tributary.

Date/Time:
November 09, 2011
12:00 PM

EPA continued the inspection by walking around the Stage 1 and Stage 2 manure storage ponds. The west and northwestern berms of the Stage 2 pond had some woody growth. **FOIA Exemption (b) (6)** stated that they intended to add soil to the slopes of the pond to change the slope to a manageable and mow-able angle. EPA walked entirely around both ponds. No depth markers were installed. The ponds were near capacity and **FOIA Exemption (b) (6)** stated that they intended to begin pumping their manure storage ponds soon. A berm to the south of the Stage 1 pond directs the run-off coming from the field to the south toward the unnamed intermittent tributary running through the facility. **FOIA Exemption (b) (6)** stated that in the summer of 2011 some field run-off made it to the pond causing it to over top its banks. **FOIA Exemption (b) (6)** stated that the berm had been modified and that the field run-off could no longer enter the ponds.



Photo 13. Facing west. Stage 1 of the manure storage ponds.

Date/Time:
November 09, 2011
10:47 AM



Photo 14. Facing east. Stage 1 manure storage pond from west side.

Date/Time:
November 09, 2011
10:56 AM



Photo 15. Facing west. South side of Stage 2 manure storage pond.

Date/Time:
November 09, 2011
10:54 AM



Photo 16. Facing west. North side of Stage 2 manure storage pond.

Date/Time:
November 09, 2011
11:01 AM

EPA continued south to the "Texas" building. Texas is comprised of four sections each with an animal capacity of 600 swine. There is a 40ft x 488ft x 8 ft manure pit beneath Texas. EPA walked entirely around Texas.



Photo 17. Facing west.
North side of Texas
buildings. Note feed
storage structures.

Date/Time:
November 09, 2011
11:14 AM



Photo 18. Facing west. South
side of Texas buildings. Note
pump used to evacuate manure
from pit beneath building.

Date/Time:
November 09, 2011
11:18 AM



Photo 19. Facing north. An access point for pumping manure from the pit on south side of Texas building.

Date/Time: November 09, 2011
11:18 AM

EPA returned to the settling basin and discussed with [FOIA Exemption (b) (6)] that samples were going to be taken and EPA offered to split the samples with him. [FOIA Exemption (b) (6)] declined. EPA took one sample, S01, from the water in the unnamed intermittent tributary at the point where the effluent from the manure hose seemed to have previously entered.



Photo 20. S01, at apparent confluence of manure pathway and unnamed intermittent tributary.

Date/Time:
November 09, 2011
12:01 PM



Photo 21. Sample S01, "Sample Location" taken at apparent confluence of manure pathway and unnamed intermittent tributary.

Date/Time:
November 09, 2011
12:00 PM



Photo 22. Sample S01

Date/Time:
November 09, 2011
12:00 PM

EPA concluded the sampling and gave a closing conference to FOIA Exemption (b) (6). During the closing conference, EPA provided the following compliance materials:

- University of Illinois Extension's Manure Share Program brochure
- EPA's CAFO Final Rulemaking – Fact Sheet

- NRCS EQIP program brochure
- EPA's Small Business Resources Information Sheet

EPA then created a field blank sample, B01, "Blank". EPA exited the facility at approximately 12:35 P.M. The fecal coliform sample was packed in ice and delivered to Joan Rogers who in turn delivered it to Tecklab Inc. and the holding time was met. The nutrient and general chemistry samples were packed on ice and mailed to the EPA Regional Laboratory in Chicago. Table 2. summarizes the sampling results

Sample ID	Sample Description (all liquid samples)	Biochemical Oxygen Demand (mg/L)	Total Kjeldahl Nitrogen (mg/L)	Nitrate- Nitrite N (mg/L)	Ammonia as N (mg/L)	Total Phosphorus (mg/L)	Total Dissolved Solids (mg/L)	Total Suspended Solids (mg/L)	Fecal Coliform (CFU/100ml)
	<i>Typical limits</i>			<i>0.1 *</i>	<i>15</i>	<i>.05</i>	<i>1000</i>		<i>200**</i>
S01	Solids Settling Area	41	8.53	42.1	4.36	1.46	1640	7	30000
B01	Blank	U	U	0.08	0.05	U	U	U	N/A

U = Not Detected

The typical limits are for general use waters and this data comes from the Illinois Water Quality Standards (IEPA 2004) unless otherwise noted. There are no Water Quality Standards for Biochemical Oxygen Demand, Total Kjeldahl Nitrogen, Nitrate-Nitrite, and Total Suspended Solids but some limits are provided and are meant to be a benchmark for comparison only.

* Maximum Nitrate-Nitrite amount for aquatic life (North Carolina State University Water Quality Group)

**Although there are no effluent limits for CAFOs, from May to October the limit in Illinois for Fecal Coliform in a stream for general use is 200 count/100ml.

- The Fecal Coliform results were analyzed by Tecklab Inc., 9795 Route 20 East, Stockton, Illinois, 61085.
- Ammonia Nitrogen, Total Phosphorus, Nitrate-Nitrite, Dissolved Solids (TDS), Total Suspended Solids (TSS), Total Kjeldahl Nitrogen (TKN), and Biochemical Oxygen Demand (BOD) were analyzed by the Region 5 Chicago Regional Laboratory.

The **FOIA Exemption (b) (6)** Pork Farm provided additional documentation via fax and email in December 2011. Documents provided included copies of the soil tests performed on field application areas, a copy of **FOIA Exemption (b) (6)** Livestock Manager Certification, confirmation of contracting the development of a Nutrient Management Plan.

EPA conformed to all biosecurity procedures including wearing disposable boots while on the site, leaving disposable boots at the site, and obtaining a vehicle wash after the inspections.

POTENTIAL VIOLATIONS

According to Section 301(a) of the Clean Water Act, it is a violation to discharge pollutants from a CAFO to waters of the United States without a permit.

EPA observed these conditions that require attention:

1. The exterior manure pit south of Wisconsin is full and was in need of emptying.
2. The hose used to pump manure from the solids settling basin has leaked manure onto the ground and had discharged to the unnamed tributary.
3. There was no depth marker located on the manure storage ponds.
4. The lack of a Nutrient Management Plan or equivalent records showing compliance with the requirements of the agricultural storm water discharge exemption makes any run-off from land application fields subject to NPDES violations.

Additionally, the following are recommended best management practices that should be considered for implementation.

EPA observed these conditions that require attention:

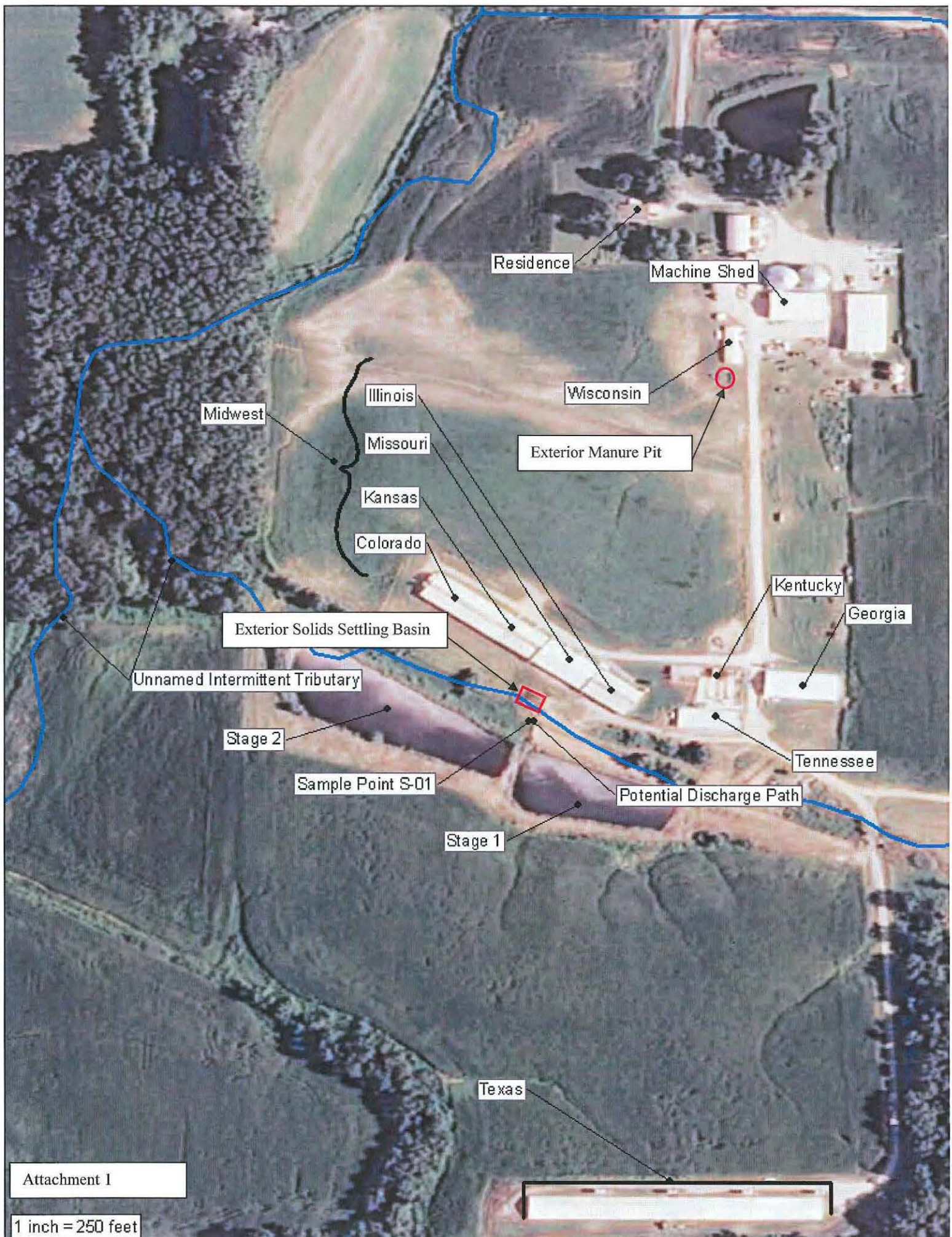
1. Vegetation around the berms was not mowed, so that owner/operator of the facility could make an adequate determination of the conditions of the berm.

LIST OF ATTACHMENTS

1. Aerial photograph of the [FOIA Exemption (b) (6)] Pork Farm site with buildings, waterways, sample locations, and discharge pathways labeled.
2. Copy of [FOIA Exemption (b) (6)] Certified Livestock Manager Certificate.
3. Laboratory analysis of samples taken at the [FOIA Exemption (b) (6)] Pork Farm.

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ATTACHMENT 2

Date Issued: 6/15/2010
Date of Expiration: 3/8/2013

STATE OF ILLINOIS

License Number: LM1897994
Type: Less than 1,000



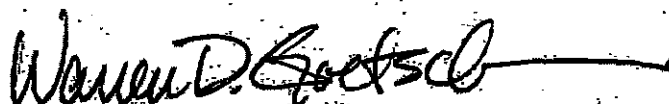
DEPARTMENT OF AGRICULTURE


CERTIFIED LIVESTOCK MANAGER CERTIFICATE

This is to certify that the person whose name appears on this certificate has complied with Section 30 of the Illinois Livestock Management Facilities Act, 510 ILCS 77/30, and/or rules and regulations adopted there under and is therefore certified as a livestock management facility manager. Therefore said person is granted certification as specified herein until the date of expiration unless and until otherwise suspended, revoked or modified as provided in the act cited.

FOIA Exemption (b) (6)

FOIA Exemption (b) (6)


Warren D. Goetsch, P.E.
Bureau Chief, Environmental Programs


Brad A. Beaver, Manager
Livestock Management Facilities Program

ATTACHMENT 3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5 CHICAGO REGIONAL LABORATORY
536 SOUTH CLARK STREET
CHICAGO, ILLINOIS 60605

Date: 12/7/2011
Subject: Review of Region 5 Data for FOIA Exempted Park
From: Francis Awanya, Group Leader
Region 5 Chicago Regional Laboratory
To: Water Division, US EPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604

The data being transmitted under this cover memo successfully passed CRL's internal data review procedures as documented in our current Quality Management Plan (QMP) and appropriate Standard Operating Procedures (SOPs). Please be aware that CRL does not perform data validation which is based on your data quality objectives. This function must be performed independently of the laboratory generating the data.

Results in this report represent only the samples analyzed.

Please have the U.S. EPA Project Manager/Officer call the CRL Sample Coordinator at (312) 353-0375 for any comments or questions.

Attached are Results for: FOIA Exempted Park

Data Management Coordinator and Date Received

Date Transmitted: ____/____/____

Analyses included in this report:

BOD



Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone: (312) 353-8370 Fax: (312) 836-2391

Water Division, US EPA Region 5
77 West Jackson Boulevard
Chicago IL, 60604

Project: **FOIA Exemption**
Project Number: 01BA2011
Project Manager: Cheryl Burdett

Reported:
Dec-07-11 09:09

ANALYSIS CASE NARRATIVE

Phone (312) 836-3682
Francis A. Awanya

General Information

Two (2) water samples, collected for the above project, were received at the Chicago Regional Laboratory (CRL) on 11/10/2011. Other pertinent information regarding those samples is provided in the final analysis report.

Samples were checked out for BOD analysis from the CRL sample custodian on 11/10/2011 and analysis began the same day. Analysis was completed within the holding time.

Sample Analysis and Results

Samples were analyzed for BOD using CRL Standard Operating Procedure (CRL SOP) AIG006 Revision No. 3.3 (Method reference SM 5210B).

Quality Control

All required quality control criteria for the laboratory, method, and system performance audits were evaluated and determined to be within the CRL's QC limits. Exceptions are as follows.

Glucose/Glutamic Acid (GGA) checks: Recovery for one of two GGA check standards, 251.5 mg/L (126%), exceeded the limit of 200 ± 37 mg/L (81.5-118.5%). This could indicate high bias. Sample results are flagged 'K' for estimated and possible high bias. The impact on data is not significant. The second GGA check (recovery 234.5 mg/L) and all other QC audit results were within the limits.

Oxygen depletions: Oxygen depletions for dilutions of field blank sample 1111006-02 were less than 2 mg/L. There is no BOD in the field blank.

Signature _____, Date _____

Francis Awanya, Group Leader

Page 2 of 4
Report Name: 1111006 FINAL Dec 07 11 0909



Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone: (312) 353-8370 Fax: (312) 886-2591

Water Division, US EPA Region 5
77 West Jackson Boulevard
Chicago IL, 60604

Project: **FOIA Exemption**
Project Number: **CLBA2011**
Project Manager: **Cheryl Burdett**

Reported:
Dec-07-11 09:09

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
S-01	1111006-01	Water	Nov-09-11 12:00	Nov-10-11 10:30
B-01	1111006-02	Water	Nov-09-11 12:00	Nov-10-11 10:30

BOD, 5 day, SM 5210 B (modified)

US EPA Region 5 Chicago Regional Laboratory

S-01 (1111006-01) Water Sampled: Nov-09-11 12:00 Received: Nov-10-11 10:30

Analyte	Result	Flags / Qualifiers	MDL	Limit	Units	Dilution	Batch	Prepared	Analyzed
Biochemical Oxygen Demand	11.6	K	2.0	2.0	mg/L	1	B111010	Nov-10-11	Nov-10-11

B-01 (1111006-02) Water Sampled: Nov-09-11 12:00 Received: Nov-10-11 10:30

Analyte	Result	Flags / Qualifiers	MDL	Limit	Units	Dilution	Batch	Prepared	Analyzed
Biochemical Oxygen Demand	2.0	U	2.0	2.0	mg/L	1	B111010	Nov-10-11	Nov-10-11



Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone: (312) 353-8370 Fax: (312) 886-2991

Water Division, US EPA Region 5
77 West Jackson Boulevard
Chicago IL, 60604

Project: **FOIA Exempt/Redacted**
Project Number: 01BA2011
Project Manager: Cheryl Burdett

Reported:
Dec-07-11 09:09

Notes and Definitions

- K The identification of the analyte is acceptable; the reported value may be biased high. The actual value is expected to be less than the reported value.
- U Not Detected
- NR Not Reported

Francis Awanya, Group Leader

Page 4 of 4
Report Name: 1111006 FINAL Dec 07 11 0909

Items for Project Manager Review

LabNumber	Analysis	Analyte	Exception
			Default Report (not modified)
			VERSION 6.08:2014
	BOD	(Water)	Result calculations based on MDL
	BOD	(Water)	Special Units: (mg/L)
1111005-01	BOD	Biochemical Oxygen Demand	K: The identification of the analyte is acceptable; the reported value may be biased high. The actual value is expected to be less than the reported value.
B111010-B81	BOD	Biochemical Oxygen Demand	Exceeds upper control limit

Sample, Log and Extraction Comments

1111006-01
BOD

pH=7
pH=7

1111006-02
BOD

pH=7
pH=7



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5 CHICAGO REGIONAL LABORATORY
536 SOUTH CLARK STREET
CHICAGO, ILLINOIS 60605



Date: 12/14/2011
Subject: Review of Region 5 Data for [FOIA Exemption b(7)(C)]
From: Laurence Wong, Analyst
Region 5 Chicago Regional Laboratory
To: Water Division, US EPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604

The data being transmitted under this cover memo successfully passed CRL's internal data review procedures as documented in our current Quality Management Plan (QMP) and appropriate Standard Operating Procedures (SOPs). Please be aware that CRL does not perform data validation which is based on your data quality objectives. This function must be performed independently of the laboratory generating the data.

Results in this report represent only the samples analyzed.

Please have the U.S. EPA Project Manager/Officer call the CRL Sample Coordinator at (312) 353-0375 for any comments or questions.

Attached are Results for: [FOIA Exemption b(7)(C)]

Data Management Coordinator and Date Received

Date Transmitted: ____/____/____

Analyses included in this report:

Solids, TDS



Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone: (312) 353-8370 Fax: (312) 836-2391



Water Division, US EPA Region 5
77 West Jackson Boulevard
Chicago IL, 60604

Project: **FOIA Exempt**
Project Number: 01BA2011
Project Manager: Cheryl Buslett

Reported:
Dec-14-11 17:27

ANALYSIS CASE NARRATIVE

Analyst Phone number: 312-353-8418

General Information

Two (2) samples were received on November 15, 2011 under Work Order #1111006 for Total Dissolved Solids (TDS) analysis. The sample preparation and analysis began on November 15, 2011 and ended on November 18, 2011. The sample holding time was met.

Sample Analysis and Results

Sample preparation, standards and analysis followed testing procedure CRL SOP AIG017, Revision No.4.4 (Standard Methods 2540 C).

Quality Control

All quality control (QC) audits followed CRL guidelines. The required quality control criteria for the laboratory, method, and system performance audits were evaluated and determined to be within the CRL's QC limits.

Signature _____, Date _____

Laurence Wong, Analyst

Page 2 of 4
Report Name: 1111006 FINAL Dec 14 11 1727



Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone: (312)353-8370 Fax: (312)886-2591



Water Division, US EPA Region 5
77 West Jackson Boulevard
Chicago IL, 60604

Project: **FOIA Exempt**
Project Number: CIBA2011
Project Manager: Cheryl Burdett

Reported:
Dec-14-11 17:27

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
S-01	1111006-01	Water	Nov-09-11 12:00	Nov-10-11 10:30
B-01	1111006-02	Water	Nov-09-11 12:00	Nov-10-11 10:30

Dissolved Solids, SM 2540C (modified)

US EPA Region 5 Chicago Regional Laboratory

S-01 (1111006-01) Water Sampled: Nov-09-11 12:00 Received: Nov-10-11 10:30

Analyte	Result	Flags / Qualifiers	MDL	Limit	Units	Dilution	Batch	Prepared	Analyzed
Total Dissolved Solids	1610		20.0	20.0	mg/L	1	B111019	Nov-15-11	Nov-15-11

B-01 (1111006-02) Water Sampled: Nov-09-11 12:00 Received: Nov-10-11 10:30

Analyte	Result	Flags / Qualifiers	MDL	Limit	Units	Dilution	Batch	Prepared	Analyzed
Total Dissolved Solids	U		20.0	20.0	mg/L	1	B111019	Nov-15-11	Nov-15-11

Laurence Wong, Analyst

Page 3 of 4
Report Name: 1111006FINAL Dec 14 11 1727



Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone: (312) 353-8370 Fax: (312) 886-2391



Water Division, US EPA Region 5
77 West Jackson Boulevard
Chicago IL, 60604

Project: **FOIA Exempt**
Project Number: 01BA2011
Project Manager: Cheryl Burdett

Reported:
Dec-14-11 17:27

Notes and Definitions

U Not Detected
NR Not Reported

Laurence Wong, Analyst

Page 4 of 4
Report Name: 1111006 FINAL Dec 14 11 1727

Items for Project Manager Review

LabNumber	Analysis	Analyte	Exception
			Default Report (not modified)
			VERSION 6.08.2014
	Solids, TDS	(Water)	Result calculations based on MDL
	Solids, TDS	(Water)	Special Units: (mg/L)

Sample, Log and Extraction Comments

1111006-01
Solids, TDS

pH = 7
pH = 7

1111006-02
Solids, TDS

pH = 7
pH = 7



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5 CHICAGO REGIONAL LABORATORY
536 SOUTH CLARK STREET
CHICAGO, ILLINOIS 60605



Date: 12/14/2011
Subject: Review of Region 5 Data for **FOIA Exempt, FOIA**
From: Laurence Wong, Analyst
Region 5 Chicago Regional Laboratory
To: Water Division, US EPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604

The data being transmitted under this cover memo successfully passed CRL's internal data review procedures as documented in our current Quality Management Plan (QMP) and appropriate Standard Operating Procedures (SOPs). Please be aware that CRL does not perform data validation which is based on your data quality objectives. This function must be performed independently of the laboratory generating the data.

Results in this report represent only the samples analyzed.

Please have the U.S. EPA Project Manager/Officer call the CRL Sample Coordinator at (312) 353-0375 for any comments or questions.

Attached are Results for: **FOIA Exempt, FOIA**

Data Management Coordinator and Data Received

Date Transmitted: ____/____/____

Analyses included in this report:

Solids, TSS



Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone: (312) 353-8370 Fax: (312) 886-2591



Water Division, US EPA Region 5
77 West Jackson Boulevard
Chicago IL, 60604

Project: **FOIA Exempt Public**
Project Number: 01BA2011
Project Manager: Cheryl Burdett

Reported:
Dec-14-11 18:18

ANALYSIS CASE NARRATIVE

Analyst Phone number: 312-353-8418

General Information

Two (2) samples under Work Order #1111006 were received on November 10, 2011 for Total Suspended Solids (TSS) analysis. The sample temperature at the receiving time was 0.2°C, within the acceptable limit of 6.0°C. The sample preparation and analysis were performed on November 15, 2011 to November 17, 2011. The sample holding time limit was met.

Sample Analysis and Results

The sample preparation and analysis followed testing procedure CRL SOP AIG018, Revision No: 3.5 (Standard Methods 2540 D).

Quality Control

All quality control (QC) audits followed CRL guidelines. The required quality control criteria for the laboratory, method, and system performance audits were evaluated and determined to be within the CRL's QC limits.

Signature _____, Date _____

Laurence Wong, Analyst

Page 2 of 4
Report Name: 1111006 FINAL Dec 14 11 1818



Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone: (312) 353-8370 Fax: (312) 886-2791



**LABORATORY
ACCREDITATION
BUREAU**
ACCREDITED ISO/IEC 17025
Certificate # L2280 Testing

Water Division, US EPA Region 5
77 West Jackson Boulevard
Chicago IL, 60604

Project: **FOIA Exempt (b)(7)(C)**
Project Number: 01BA2011
Project Manager: Cheryl Burdett

Reported:
Dec-14-11 18:18

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
S-01	1111006-01	Water	Nov-09-11 12:00	Nov-10-11 10:30
B-01	1111006-02	Water	Nov-09-11 12:00	Nov-10-11 10:30

Total Suspended Solids, SM 2540 D (modified)

US EPA Region 5 Chicago Regional Laboratory

S-01 (1111006-01) Water Sampled: Nov-09-11 12:00 Received: Nov-10-11 10:30

Analys	Result	Flags / Qualifiers	MDL	Limit	Units	Dilution	Batch	Prepared	Analyzed
Total Suspended Solids	7			5	mg/L	1	B111020	Nov-15-11	Nov-15-11

B-01 (1111006-02) Water Sampled: Nov-09-11 12:00 Received: Nov-10-11 10:30

Analys	Result	Flags / Qualifiers	MDL	Limit	Units	Dilution	Batch	Prepared	Analyzed
Total Suspended Solids	U			5	mg/L	1	B111020	Nov-15-11	Nov-15-11



Environmental Protection Agency Region 5
Chicago Regional Laboratory

536 South Clark Street, Chicago, IL 60605
Phone: (312) 353-8370 Fax: (312) 886-2391



Water Division, US EPA Region 5
77 West Jackson Boulevard
Chicago IL, 60604

Project: **FOIA Exemption**
Project Number: 01BA2011
Project Manager: Cheryl Burdett

Reported:
Dec-14-11 18:18

Notes and Definitions

* This Quality Control measure meets the requirements of the CRL SOP for this analyte.
U Not Detected
NR Not Reported

Laurence Wong, Analyst

Page 4 of 4
Report Name: 1111006 FINAL Dec 14 11 1818

Items for Project Manager Review

LabNumber	Analysis	Analyte	Exception
			Default Report (not modified)
			VERSION 6.08.2014
	Solids, TSS	(Water)	Special Units: (mg/L)
B111020-SRM1	Solids, TSS	Total Suspended Solids	*: This Quality Control measure meets the requirements of the CRL SOP for this analyte.

Sample, Log and Extraction Comments

1111006-01
Solids, TSS

pH=7
pH=7

1111006-02
Solids, TSS

pH=7
pH=7



November 16, 2011

Joan Rogers
USEPA Region 5
77 West Jackson Blvd.
Chicago, IL 60604
TEL: (312) 886-1463
FAX:



RE: **FOIA Exemption (b)** Pork 01BA2011

WorkOrder: 11110463

Dear Joan Rogers:

TEKLAB, INC received 1 sample on 11/9/2011 3:28:00 PM for the analysis presented in the following report.

Samples are analyzed on an as received basis unless otherwise requested and documented. The sample results contained in this report relate only to the requested analytes of interest as directed on the chain of custody. NELAP accredited fields of testing are indicated by the letters NELAP under the Certification column. All tests are performed in the Collinsville, IL laboratory unless otherwise noted in the Case Narrative.

All quality control criteria applicable to the test methods employed for this project have been satisfactorily met and are in accordance with NELAP except where noted. The following report shall not be reproduced, except in full, without the written approval of Teklab, Inc.

If you have any questions regarding these tests results, please feel free to call.

Sincerely,

A handwritten signature in black ink that reads "Shelly A. Hennessy".

Shelly A. Hennessy
Project Manager
(618)344-1004 ex 36
SHennessy@teklabinc.com



Report Contents

<http://www.teklabinc.com/>

Client: USEPA Region 5

Work Order: 11110463

Client Project: FOIA Exemption Pork 01BA2011

Report Date: 16-Nov-11

This reporting package includes the following:

Cover Letter	1
Report Contents	2
Definitions	3
Case Narrative	4
Laboratory Results	5
Sample Summary	6
Dates Report	7
Quality Control Results	8
Receiving Check List	9
Chain of Custody	Appended



Definitions

<http://www.teklabinc.com/>

Client: USEPA Region 5

Work Order: 11110463

Client Project: **FOIA Exempt** Pork 01BA2011

Report Date: 16-Nov-11

Abbr Definition

CCV Continuing calibration verification is a check of a standard to determine the state of calibration of an instrument between recalibration.

DF Dilution factor is the dilution performed during analysis only and does not take into account any dilutions made during sample preparation. The reported result is final and includes all dilutions factors.

DNI Did not ignite

DUP Laboratory duplicate is an aliquot of a sample taken from the same container under laboratory conditions for independent processing and analysis independently of the original aliquot.

ICV Initial calibration verification is a check of a standard to determine the state of calibration of an instrument before sample analysis is initiated.

IDPH IL Dept. of Public Health

LCS Laboratory control sample, spiked with verified known amounts of analytes, is analyzed exactly like a sample to establish intra-laboratory or analyst specific precision and bias or to assess the performance of all or a portion of the measurement system. The acceptable recovery range is in the QC Package (provided upon request).

LCSD Laboratory control sample duplicate is a replicate laboratory control sample that is prepared and analyzed in order to determine the precision of the approved test method. The acceptable recovery range is listed in the QC Package (provided upon request).

MB Method blank is a sample of a matrix similar to the batch of associated sample (when available) that is free from the analytes of interest and is processed simultaneously with and under the same conditions as samples through all steps of the analytical procedures, and in which no target analytes or interferences should present at concentrations that impact the analytical results for sample analyses.

MDL Method detection limit means the minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is greater than zero and is determined from analysis of a sample in a given matrix type containing the analyte.

MS Matrix spike is an aliquot of matrix fortified (spiked) with known quantities of specific analytes that is subjected to the entire analytical procedures in order to determine the effect of the matrix on an approved test method's recovery system. The acceptable recovery range is listed in the QC Package (provided upon request).

MSD Matrix spike duplicate means a replicate matrix spike that is prepared and analyzed in order to determine the precision of the approved test method. The acceptable recovery range is listed in the QC Package (provided upon request).

MW Molecular weight

ND Not Detected at the Reporting Limit

NELAP NELAP Accredited

PQL Practical quantitation limit means the lowest level that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operation conditions. The acceptable recovery range is listed in the QC Package (provided upon request).

RL The reporting limit the lowest level that the data is displayed in the final report. The reporting limit may vary according to customer request or sample dilution. The reporting limit may not be less than the MDL.

RPD Relative percent difference is a calculated difference between two recoveries (i.e. MS/MSD). The acceptable recovery limit is listed in the QC Package (provided upon request).

SPK The spike is a known mass of target analyte added to a blank sample or sub-sample; used to determine recovery deficiency or for other quality control purposes.

Surr Surrogates are compounds which are similar to the analytes of interest in chemical composition and behavior in the analytical process, but which are not normally found in environmental samples.

TNTC Too numerous to count (> 200 CFU)

Qualifiers

- Unknown hydrocarbon

E - Value above quantitation range

J - Analyte detected below quantitation limits

ND - Not Detected at the Reporting Limit

S - Spike Recovery outside recovery limits

B - Analyte detected in associated Method Blank

H - Holding times exceeded

M - Manual Integration used to determine area response

R - RPD outside accepted recovery limits

X - Value exceeds Maximum Contaminant Level



Case Narrative

<http://www.teklabinc.com/>

Client: USEPA Region 5

Work Order: 11110463

Client Project: FOIA Exempted Pork 01BA2011

Report Date: 16-Nov-11

Cooler Receipt Temp: 8.8 °C

Locations and Accreditations

Collinsville			Springfield			Kansas City		
Address	5445 Horseshoe Lake Road		Address	3920 Pintail Dr		Address	8421 Nieman Road	
	Collinsville, IL 62234-7425			Springfield, IL 62711-9415			Lenexa, KS 66214	
Phone	(618) 344-1004		Phone	(217) 698-1004		Phone	(913) 541-1998	
Fax	(618) 344-1005		Fax	(217) 698-1005		Fax	(913) 541-1998	
Email	jiriley@teklabinc.com		Email	kmcclain@teklabinc.com		Email	dthompson@teklabinc.com	
State	Dept	Cert #	NELAP	Exp Date	Lab			
Illinois	IEPA	100226	NELAP	1/31/2012	Collinsville			
Kansas	KDHE	E-10374	NELAP	1/31/2012	Collinsville			
Louisiana	LDEQ	166493	NELAP	6/30/2012	Collinsville			
Louisiana	LDEQ	166578	NELAP	6/30/2012	Springfield			
Arkansas	ADEQ	88-0966		3/14/2012	Collinsville			
Illinois	IDPH	17584		4/30/2012	Collinsville			
Kentucky	USI	0073		5/26/2012	Collinsville			
Missouri	MDNR	00930		4/13/2013	Collinsville			
Oklahoma	ODEQ	9978		8/31/2012	Collinsville			



Laboratory Results

<http://www.teklabinc.com/>

Client: USEPA Region 5
Client Project: **FOIA Exempt** Park 01BA2011
Lab ID: 11110463-001
Matrix: WASTE WATER

Work Order: 11110463
Report Date: 16-Nov-11
Client Sample ID: Brazinski
Collection Date: 11/09/2011 12:00

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Batch
STANDARD METHODS 18TH ED. 9222 D MEMBRANE FILTER								
Fecal Coliform		1000		30000	CFU/100ml	1000	11/09/2011 16:50	R156707



Sample Summary

<http://www.teklabinco.com/>

Client: USEPA Region 5

Work Order: 11110463

Client Project: FOIA Exemption Park 01BA2011

Report Date: 16-Nov-11

Lab Sample ID	Client Sample ID	Matrix	Fractions	Collection Date
11110463-001	option (b) (6)	Waste Water	1	11/09/2011 12:00



Dates Report

<http://www.teklabinc.com/>

Client: USEPA Region 5

Work Order: 11110463

Client Project: FOIA Exemption Park 01BA2011

Report Date: 16-Nov-11

Sample ID	Client Sample ID	Collection Date	Received Date	
	Test Name		Prep Date/Time	Analysis Date/Time
11110463-001A	Brazinski	11/09/2011 12:00	11/9/2011 3:28:00 PM	
	Standard Methods 18th Ed. 9222 D Membrane Filter			11/09/2011 16:50



Quality Control Results

<http://www.teklabinc.com/>

Client: USEPA Region 5

Work Order: 11110463

Client Project: **FOIA Exempted** Park 01BA2011

Report Date: 16-Nov-11

STANDARD METHODS 18TH ED. 9222 D MEMBRANE FILTER

Batch R156707 SampleType: MBLK Units CFU/100ml
SampleID: MB-R156707

Analyses	RL	Qual	Result	Spike	SPK Ref Val	%REC	LowLimit	High Limit	Date Analyzed
Fecal Coliform	1		< 1						11/09/2011



Receiving Check List

<http://www.teklabinc.com/>

Client: USEPA Region 5

Work Order: 11110463

Client Project: FOIA Exemption Cork 01BA2011

Report Date: 16-Nov-11

Carrier: Joan Rogers

Received By: TWM

Completed by:

On:

09-Nov-11

Brenda S. Johnson

Reviewed by:

On:

10-Nov-11

Shelly A. Hennessy

Pages to follow:

Chain of custody

1

Extra pages included

0

Shipping container/cooler in good condition?

Yes ☒

No ☐

Not Present ☐

Temp °C 8.8

Type of thermal preservation?

None ☐

Ice ☒

Blue Ice ☐

Dry Ice ☐

Chain of custody present?

Yes ☒

No ☐

Chain of custody signed when relinquished and received?

Yes ☒

No ☐

Chain of custody agrees with sample labels?

Yes ☒

No ☐

Samples in proper container/bottle?

Yes ☒

No ☐

Sample containers intact?

Yes ☒

No ☐

Sufficient sample volume for indicated test?

Yes ☒

No ☐

All samples received within holding time?

Yes ☒

No ☐

Reported field parameters measured:

Field ☐

Lab ☐

NA ☒

Container/Temp Blank temperature in compliance?

Yes ☒

No ☐

When thermal preservation is required, samples are compliant with a temperature between 0.1°C - 6.0°C, or when samples are received on ice the same day as collected.

Water - at least one vial per sample has zero headspace?

Yes ☐

No ☐

No VOA vials ☒

Water - TOX containers have zero headspace?

Yes ☐

No ☐

No TOX containers ☒

Water - pH acceptable upon receipt?

Yes ☒

No ☐

Any No responses must be detailed below or on the COC.